



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT  
BUREAU OF WASTE MANAGEMENT  
FORBES FIELD, TOPEKA, KANSAS 66620



**HAZARDOUS WASTE GENERATOR/TRANSPORTER  
COMPLIANCE INSPECTION CHECKLIST**

GENERAL

☒ ROUTINE ☐ COMPLAINT

EPA ID KSD 000 203 638 Time 9:30 am Date 2/28/02

Facility Name Ashland Specialty Chemical Company, Drew Division District Northeast

Street 3155 Fiberglass Road City Kansas City, Kansas ZIP 66115

Mailing Address (if different than above) Same

County Wyandotte Phone (913) 621-6410

Contact(s) Don Christman, Mfct. Supervisor (Not present); Scott Marckini, Marketing Mgr

Inspector(s) Rebecca Wenner, Mostafa Kamal SIC:

Type of Business Marketing, sales and equipment manufacture Number of Employees 6 FT

Facility size classification: ☐ Closed ☒ Small Qty. Generator ☐ EPA Generator  
☐ Not a Generator ☐ Kansas Generator ☐ Transporter

Other Regulated Activities: ☐ T/S/D Facility ☐ Used Oil Activities  
(complete applicable checklist) ☐ HW Burner/Marketer ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets (KSA 65-3447)? No  
If yes, explain:

**Industrial Wastes Generated**

(List hazardous wastes first)

Waste:	Solvent Contaminated paper towels (Methanol, Acetone, Ethyl Alcohol)	
If waste is hazardous give HW ID Number:	F003	
Amount generated per month:	< 1 pound	
Amount presently in storage:	None	
Accumulation time:	N/A	
Present disposal methods:	Regular Trash	



R00403483

RCRA RECORDS CENTER

**General Requirements (GGR)**

- |   | YES | NO    | NA |
|---|-----|-------|----|
| 1. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? [KAR 28-31-4(b)/40 CFR 261.2]       | [ ] | [ X ] |    |
| a. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? [KAR 28-31-4(b)(3)(A)]                       | [ ] | [ ]   |    |
| b. If waste(s) was tested, are the results kept for three years from date waste was sent on/offsite for T/S/D? [KAR 28-31-4(f)(1)(C)] | [ ] | [ ]   |    |
| 2. Is hazardous waste(s) disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW)? [KAR 28-31-3/40 CFR 261.4]    | [ ] | [ X ] |    |
| a. If yes, does the facility discharge greater than 25 kilograms per month?   | [ ] | [ ]   |    |
| b. If yes, has facility submitted the RCRA (Wastewater) Notification Form [40 CFR, Part 403.12(p)] to the following agencies:         |     |       |    |
| City - POTW?  | [ ] | [ ]   |    |
| US EPA Region VII - Director of Waste Management?   | [ ] | [ ]   |    |
| KDHE - Bureau of Waste Management?  | [ ] | [ ]   |    |
| NOTE: RCRA (Wastewater) Notification forms are obtained from: Bureau of Water (785) 296-5551.   |     |       |    |
| 3. Does facility dispose of industrial waste that requires a Special Waste Disposal Authorization at a permitted sanitary landfill?   | [ ] | [ X ] |    |
| a. If yes, list the authorization number(s):  |     |       |    |

General Requirements:	[X] Compliance	[ ] Non-Compliance	[ ] N/A
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**Notification of Requirements (GGR)**

- |   |       |     |     |
|---|-------|-----|-----|
| 4. Has facility notified KDHE and obtained an EPA Identification Number? [KAR 28-31-4(c)] | [ X ] | [ ] |     |
| 5. Is current notification accurate? [KAR 28-31-4(c)(1)]                                  | [ X ] | [ ] | [ ] |

Notification Requirements:	[X] Compliance	[ ] Non-Compliance	[ ] N/A
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(small quantity generator not accumulating, stop here)

# **RCRA Compliance Evaluation Inspection Summary**

## **Ashland Specialty Chemical Company, Drew Division**

3155 Fiberglass Road  
Kansas City, KS 66115

**EPA ID No.: KSD 000 203 638**

**Inspection Date: 2/28/02**

KDHE Inspector: Rebecca Wenner, BWM-Compliance and Enforcement Unit

On February 28, 2002, a routine inspection was conducted at Ashland Specialty Chemical Company, Drew Division (Ashland) to determine compliance with state hazardous waste regulations. This facility was last inspected as a small quantity generator of hazardous waste on December 1, 1999. This facility formerly operated a hazardous waste Treatment, Storage, Disposal (TSD) facility.

I arrived at the facility at approximately 9:30 am and met with Mr. Scott Marckini, Marketing Manager. Mr. Marckini explained that the person with the most knowledge about the operations at the facility is Mr. Don Christman, Manufacturing Supervisor, but that Mr. Christman would not be available until later in the day. I presented my credentials and discussed the purpose of the inspection with Mr. Marckini. Mr. Marckini assisted with the inspection, and I spoke to Mr. Christman by telephone at about 2:30 pm the day of the inspection, to confirm information received during the inspection and to obtain additional information. Mr. Mostafa Kamal, Hazardous Waste Permit Section Chief for KDHE's Bureau of Waste Management accompanied me on this inspection.

This facility currently serves as a marketing and sales office for Ashland. The facility is also used in the manufacturing of chlorine dioxin generators and ancillary equipment. Most of the building is vacant and not in use, or is used only for storage of paper and files, and some small equipment.

The cabinets used in the manufacture of the chlorine dioxin generators are already assembled when they arrive at the facility. They have often been in storage and must be power washed at the facility. The power wash unit uses water heated by a kerosene heater according to Mr. Christman. One, three-liter container of kerosene was found in a flammable storage cabinet in the paint room, and according to Mr. Christman, will be used for this purpose.

The manufacturing process involves preparing and glueing pipes, spray painting, and electrical work. The only wastes generated at the facility are empty cans of chemicals used for preparing and glueing

pipes, empty spray paint cans, and solvent contaminated rags. Only a few rags (paper towels) are used at the facility according to Mr. Christman, and they are dry when they are put into the trash. Located in the flammable storage cabinet in the paint room were: one, four-liter unopened container of methanol; one, three-liter container of kerosene (full); one, four-liter container of acetone (about half full); and three, one-liter containers of ethyl alcohol. According to Mr. Christman, these chemicals (except the kerosene) will be used at the facility to clean cabinets and to help prepare pipes. The chemicals are left from the former laboratory at the facility. I explained to Mr. Christman that using these chemicals is preferable to disposing of them, but to be aware that if the facility's generator status changes, the solvent contaminated rags may be a hazardous waste.

There was also one five-gallon can of DBE Cleaning Solvent located outdoors, under a roof, on the east side of the facility. This container had an open bung (which was closed during the inspection). The warning label on the container stated that this substance is flammable, and contains styrene monomer. Neither Mr. Christman nor Mr. Marckini were aware that this can was at the facility. Mr. Christman said that when he returned to the facility he was made aware of the cans presence and that he believed that they would be able to use this chemical for cleaning as well. He thought that it may have been left at the facility when a fiberglass tank located in the area of the can was removed about one and a half years ago.

There were also two, 55-gallon drums located outdoors, under a roof, on the east side of the building. These drums were labeled "Olin-OWS Phase II", and dated February of 2001. They appeared to contain soil and purge water from the contamination investigation activities at the site. Mr. Christman provided me with the name and telephone number for Mr. James Young, Olin (former property owners), at 423-336-4064. Mr. Young is the environmental manager for Olin for this site. I contacted Mr. Young on February 28, 2002 to obtain copies of the analytical data for these drums, and to inquire about their disposal plan for these drums. Mr. Young said he would check and get back to me.

No violations were identified during the inspection. I sent the attached letter to the facility summarizing the results of the inspection.



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Division of Environment

Digital Photo Mounting Sheet

(Photos were not altered except to change the size of the file)

Name of Site: Ashland Specialty Chemical Company, Drew Division

Location: 3155 Fiberglass Road

City Kansas City County Kansas Legal \_\_\_\_\_



Picture No: 1

Date: 2/28/02

Facing: East

Weather: Clear, 45 degrees F

Comments: A view of the acetone, methanol, kerosene, and ethyl alcohol located in the flammable storage cabinet in the paint room at the facility.



Picture No: 2

Date: 2/28/02

Facing: East

Weather: Clear, 45 degrees F

Comments: A view of the outside of the flammable storage cabinet shown in photo 1.



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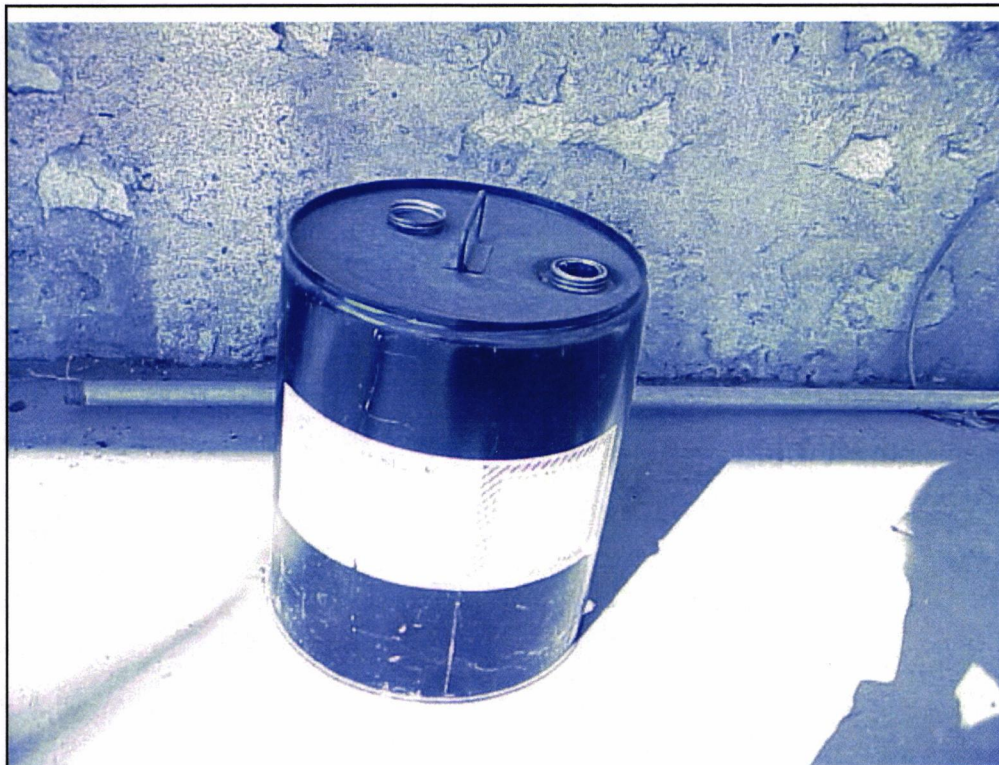
Digital Photo Mounting Sheet

(Photos were not altered except to change the size of the file)

Name of Site: Ashland Specialty Chemical Company, Drew Division

Location: 3155 Fiberglass Road

City Kansas City County Kansas Legal \_\_\_\_\_



Picture No: 3

Date: 2/28/02

Facing: West

Weather: Clear, 45 degrees F

Comments: A view of the 5-gallon can of DBE Cleaning solvent found outdoors on the east side of the building. Note the bung was off of this container, but was replaced during the inspection.

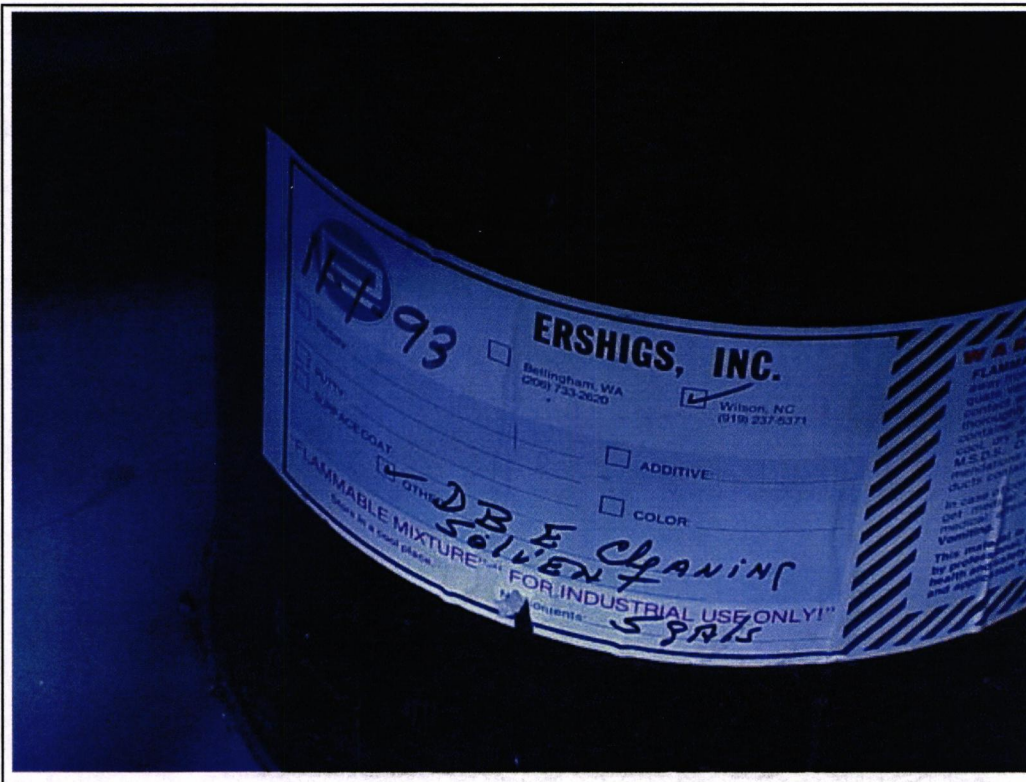
Picture No: 4

Date: 2/28/02

Facing: West

Weather: Clear, 45 degrees F

Comments: A closer view of the label on the container shown in photo 3.





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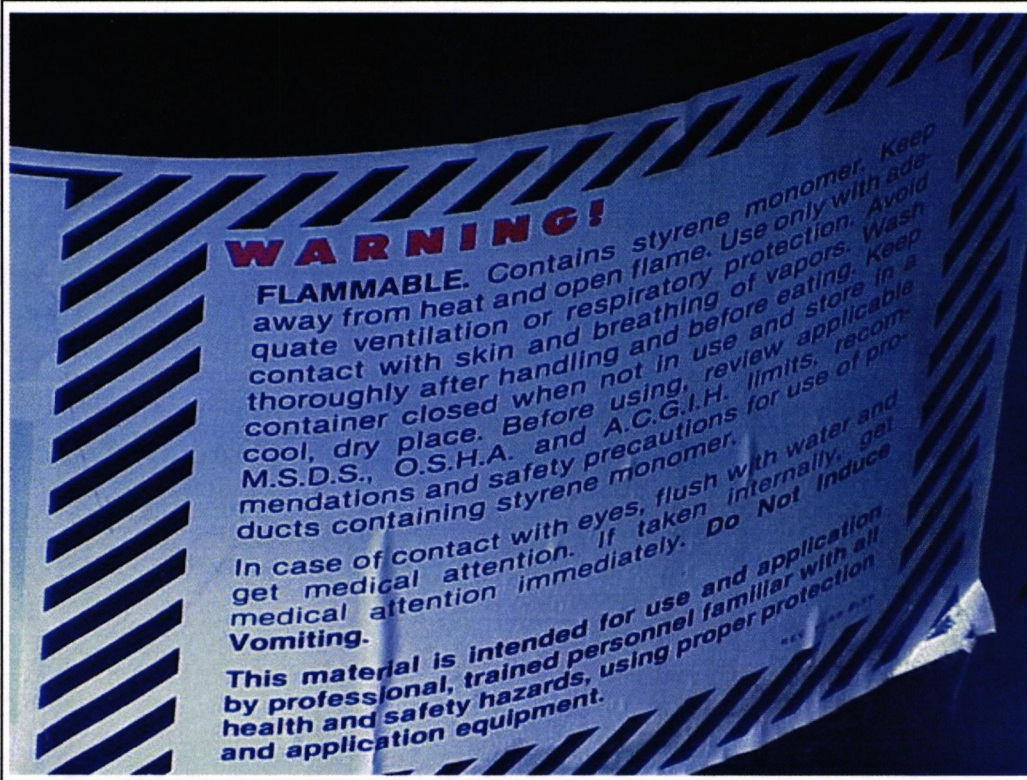
Digital Photo Mounting Sheet

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Name of Site: Ashland Specialty Chemical Company, Drew Division

Location: 3155 Fiberglass Road

City Kansas City County Kansas Legal \_\_\_\_\_



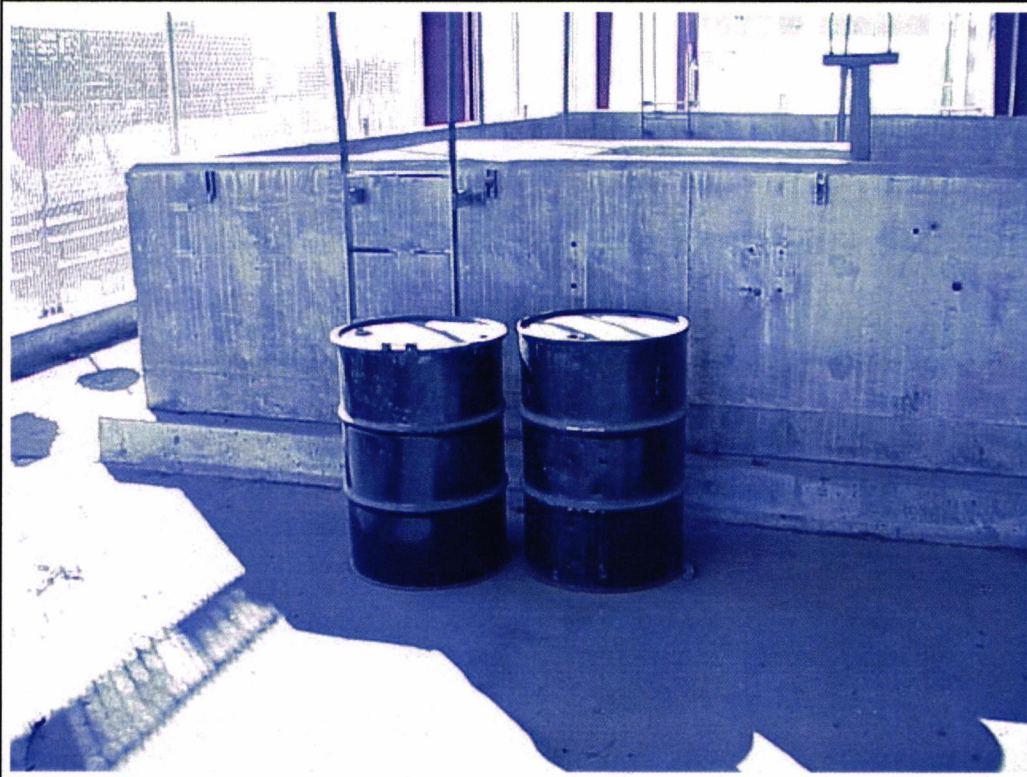
Picture No: 5

Date: 2/28/02

Facing: West

Weather: Clear, 45 degrees F

Comments: A closer view of the warning portion of the label on the container shown in photo 3.



Picture No: 6

Date: 2/28/02

Facing: South

Weather: Clear, 45 degrees F

Comments: A view of the two drums located on the east side of the building.